



Independent External Monitoring Agriculture Report, 2021

Fair Labor Association conducts an Independent External Monitoring (IEM) assessment when a company has begun implementation of its internal monitoring and remediation program. An IEM allows the assessment of labor conditions at the farm level and first level processing if it overlaps with the farms based on the [FLA Agriculture Workplace Code of Conduct and Monitoring Benchmarks for the Agriculture Sector](#). FLA gathers further data through community stakeholder interviews with civil society organizations, government officials, community leaders, and supply chain actors. FLA examines internal monitoring systems at the country level against [FLA's Principles of Fair Labor and Responsible Sourcing for Agricultural Supply Chains](#).

Company	Nestle
Country	Cameroon
Crop	Cocoa
Production process	Farm clearing, pruning and pesticide spraying.
Assessment location	Cameroon
Monitor	ETSA
Assessment dates	08 June to 14 June 2022
Number of assessed farms	156
Total area covered	1474.75 ha
Number of farmers interviewed	156
Total number of workers	2262
Number of workers interviewed	Nil.

Employment Relationship

Compliance Status

Section	Benchmark	Compliance status	Farms
Human Resource Management System	ER.1.1	In Compliance	All farms
	ER.2.1 (PR)	In progress	All farms
	ER.2.1.1 (PR)	In progress	All farms
Recruitment and Hiring	ER.3.1	Not Applicable	
	ER.3.1.1	Not Applicable	
	ER.3.1.2	Not Applicable	
	ER.4	Not Applicable	
	ER.5.1	Not Applicable	
	ER.5.2	Not Applicable	
	ER.5.3	In Compliance	
	ER.6 (PR)	In Compliance	
	ER.7.1	In Compliance	
	ER.7.2	Not Applicable	
	ER.7.3	In Compliance	
	ER.7.4	Not Applicable	
	ER.7.5	In Compliance	
	ER.7.6	In Compliance	
	ER.7.7	In Compliance	
ER.7.8	In Compliance		
Terms and Conditions	ER.9.1	In Compliance	
	ER.9.2.1	In Compliance	
	ER.9.2.2	In Compliance	
	ER.9.2.3	In Compliance	
	ER.9.3.1	In Compliance	
	ER.9.3.2	Noncompliance	farm 51, farm 109, farm 121, farm 131
	ER.9.3.3	In Compliance	
	ER.10	Not Applicable	
	ER.11	Risk of Noncompliance	All farms
	ER.12.1	Noncompliance	farm 1, farm 2, farm 4, farm 7, farm 10, farm 11, farm 13, farm 14, farm 15, farm 16, farm 17, farm 19, farm 20, farm 22, farm 26, farm 27, farm 29, farm 30, farm 31, farm 32, farm 33, farm 34, farm 35, farm 36, farm 37, farm 38, farm 39, farm 40, farm 41, farm 42, farm 43, farm 44, farm 45, farm 48, farm 51, farm 52, farm 54, farm 55, farm 56, farm 58, farm 60, farm 61, farm 62, farm 66, farm 69, farm 71, farm 72, farm 73, farm 75, farm 78, farm 79, farm 81, farm 82, farm 83, farm 84, farm 85, farm 86, farm 87, farm 88, farm 89, farm 90, farm 91, farm 92, farm 93, farm 94, farm 95, farm 96, farm 98, farm 99, farm 100, farm 101, farm 102, farm 103, farm 104, farm 105, farm 106, farm 107, farm 108, farm 110, farm 111, farm 112, farm 114, farm 115, farm 117, farm 120, farm 121, farm 122, farm 133, farm 141, farm 142, farm 143, farm 145, farm 146, farm 150, farm 155, farm 156
	ER.12.1.1	In Compliance	
	ER.12.2	Not Applicable	
	ER.13.1	Noncompliance	farm 1, farm 7, farm 10, farm 11, farm 13, farm 14, farm 15, farm 16, farm 17, farm 19, farm 20, farm 22, farm 27, farm 29, farm 30, farm 31, farm 32, farm 33, farm 34, farm 35, farm 36, farm 37, farm 38, farm 39, farm 40, farm 41, farm 42, farm 43, farm 44, farm 45, farm 51, farm 52, farm 54, farm 55, farm 56, farm 60, farm 61, farm 62, farm 66, farm 69, farm 71, farm 72, farm 73, farm 75, farm 78, farm 79, farm 81, farm 82, farm 83, farm 84, farm 85, farm 86, farm 87, farm 88, farm 90, farm 91, farm 93, farm 94, farm 95, farm 96, farm 99, farm 100, farm 101, farm 102, farm 103, farm

			104, farm 105, farm 106, farm 107, farm 108, farm 110, farm 111, farm 112, farm 114, farm 115, farm 117, farm 120, farm 121, farm 122, farm 133, farm 141, farm 142, farm 143, farm 146, farm 150, farm 155, farm 156
	ER.13.2 (PR)	In progress	All farms
	ER.13.3 (PR)	In progress	All farms
Administration	ER.15.1	Not Applicable	
	ER.15.2	Not Applicable	
	ER.15.2.1	Not Applicable	
	ER.16.1	In Compliance	
	ER.16.2	In Compliance	
	ER.17.2 (PR)	Not initiated	
	ER.17.3 (PR)	Not Applicable	
	ER.17.4 (PR)	Not Applicable	
Worker Involvement	ER.18.1	In Compliance	
	ER.18.2 (PR)	In Compliance	
Right to Organize and Bargain	ER.19	In Compliance	
Work Rules and Discipline	ER.20.1	Noncompliance	All farms
	ER.20.2	Noncompliance	All farms
	ER.20.3 (PR)	Not initiated	
	ER.20.4	Noncompliance	All farms
	ER.20.6	Noncompliance	All farms
	ER.20.7	Noncompliance	All farms
	ER.20.8	Noncompliance	All farms
	ER.20.9 (PR)	Not initiated	All farms
	ER.20.11	Noncompliance	All farms
Access to Training for Family Members	ER.21	Noncompliance	farm 28, farm 30, farm 31, farm 89, farm 93, farm 94, farm 95, farm 96, farm 100, farm 117, farm 120, farm 121, farm 122, farm 131, farm 136, farm 138, farm 141, farm 146, farm 150, farm 152, farm 155
HSE Management System	ER.24.1.	In Compliance	
	ER.24.2 (PR)	In Compliance	
	ER.24.3	In Compliance	
	ER.24.4.1 (PR)	Not initiated	All farms
	ER.24.4.2 (PR)	Not initiated	All farms
	ER.24.4.3 (PR)	In progress	All farms
	ER.24.4.4 (PR)	In progress	All farms
	ER.24.4.5 (PR)	Not initiated	All farms
	ER.24.4.6 (PR)	In Compliance	
	ER.24.5 (PR)	In Compliance	
Grievance Procedures	ER.25.1 (PR)	Not initiated	All farms
	ER.25.2 (PR)	Not Applicable	
	ER.25.3	In Compliance	
	ER.25.4	In Compliance	

Employment Relationship Assessment Summary

Terms and Conditions	
Benchmarks	Compliance Status
ER.9.3: There can be no employment terms (including in written or verbal contracts or any other instruments or in any formal or informal recruitment arrangements) which allow employers: ER.9.3.2: use earned back wages as penalties; and	Noncompliance in 4 farms
ER.12.1: Employers shall regularly inform workers about workplace rules, health and safety information, and laws regarding workers' rights with respect to freedom of association, compensation, working hours, and any other legally required information, and the FLA Code through appropriate means, including posted in local language(s) throughout the workplace's common areas or in the surrounding community. In the case of workplaces with informal labor structures, these communication and awareness raising activities could be done with support from supply chain intermediaries such as cooperatives, organizers, tier one suppliers or the participating company.	Noncompliance in 93 farms

ER.13.1: Farmer, sharecropper or any kind of supervisor who is leading workers shall have knowledge of the local labor laws and the FLA Code.		Noncompliance in 84 farms
ER.11: Employers shall ensure that all legally mandated requirements for the protection or management of special categories of workers, including migrant, juvenile, contract/contingent/temporary, casual, daily, home workers, pregnant or disabled workers, are implemented.		Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	<p>ER.9.3.2: The Company has signed supply contracts with direct suppliers, LBAs (Cooperatives), and smallholder farmers. A copy of the signed supply contract is provided to the LBA or smallholder farmer, which includes terms and conditions, including compliance with the TELCAR code of conduct. The contracts also outline sanctions in case of a party violating the Company's code provisions and labor standards. However, four farmers reported retaining workers income for failing to go to work and for recovery of damages incurred due to burnt cocoa farms.</p> <p>ER.12.1, ER.13.1: Eighty-four farmers were not informed of the company's code of conduct and the country's laws.</p> <p>ER.11: Additionally, all the farmers are not aware of all legally mandated requirements for special categories of workers.</p> <p><u>Source:</u> Farmers and IMS Interview</p>	
Company Action Plan		
Activity	<ol style="list-style-type: none"> 1. Conduct training of trainers (ToT) on Country labor laws and Telcar's code of conduct. 2. Carry out routine checks to ensure that workers' rights are respected 	
Output indicators (targeted results)	<ol style="list-style-type: none"> 1. Field school session reports on farmers' training on country labor laws and Telcar's code of conduct. 2. Routine check reports as regards compliance of farm owners with labour standards. 	
Timeline and Deadline Date	6 Months/ Deadline April 2024	
Input (budget/resources)	<ol style="list-style-type: none"> 1. ToT training budgets on Country labor laws and Telcar's code of conduct. 	
Responsible staff (title/department)	<ol style="list-style-type: none"> 1. The Legal Adviser, Telcar's legal department will be responsible for Country labor laws. 2. The Human Resource Manager, Telcar's Human Resource department for to be responsible for Telcar's code of conduct. 	

Work Rules and Discipline	
Benchmarks	Compliance Status
ER.20.1: Employers shall have disciplinary rules and practices that embody a system of progressive discipline (e.g. a system of maintaining discipline through the application of escalating disciplinary action moving from verbal warnings to written warnings to suspension and finally to termination). ER.20.2: Any person supervising workers shall be aware of the disciplinary rules and practices. ER.20.4: The disciplinary system shall be applied in a fair and non-discriminatory manner and include a management review of the actions by someone senior to the manager who imposed the disciplinary action.	Noncompliance in all farms

<p>ER.20.6: Disciplinary rules and practices shall be clearly communicated to all workers. ER.20.7: Workers must be informed when a disciplinary procedure has been initiated against them. ER.20.8: Workers have the right to participate and be heard in any disciplinary procedure against them. ER.20.11: The disciplinary system shall include a third party witness during imposition, and an appeal process. In case of smallholder settings, existing appeal mechanism at community level is acceptable.</p>		
Findings/Noncompliance Explanation	<p>According to the Internal Management System (IMS) review, the Company has signed supply contracts with direct suppliers; LBAs (Cooperatives) and smallholder farmers. A copy of the signed supply contract is given to the LBA or smallholder farmer. The contracts provide for sanctions should a party violate the Company code provisions and the labour standards. However, there is no documented and/or formal disciplinary system in place for farm workers. Farmers had verbal agreement with the workers on all the requirements related to their activities.</p> <p><u>Source:</u> IMS review and farmers Interview</p>	
Company Action Plan		
Activity	Put in place a disciplinary system (written disciplinary document). Share in all locations.	
Output indicators (targeted results)	Copy of written disciplinary document archived at farmers/workers level and the dedicated IMS office.	
Timeline and Deadline Date	4 Months/Deadline February 2024	
Input (budget/resources)	IMS documentation build up budget.	
Responsible staff (title/department)	<ol style="list-style-type: none"> 1. Legal Adviser, Telcar Cocoa Ltd. 2. Human Resource Manager, Telcar's Human Resource department. 	

Access to Training for Family Members		
Benchmarks	Compliance Status	
ER.21: Family members (spouses and adult children) involved directly or indirectly in agriculture production shall have access to all training and awareness raising activities conducted for the workers and growers on the farms.	Noncompliance in 21 farms	
Findings/Noncompliance Explanation	<p>The listed farms reported they have never received training invitations citing poor information flow and farmer selection. So, their family members as well did not participate in any trainings.</p> <p><u>Source:</u> Farmers Interview</p>	
Company Action Plan		
Activity	<p>Cargill and Telcar's training model is community based, open to farmers, farm workers family members and inhabitants of the community. Training is done through farmers' field schools, household coaching sessions, community sensitizations. The training program is communicated two weeks prior to training through village chiefs, LBAs and facilitators. In the perspective of continuous improvement, we will establish a credible communication system that ensures that information reaches farmers on time.</p>	

Output indicators (targeted results)	Written communication strategy
Timeline and Deadline Date	4 Months/Deadline February 2024
Input (budget/resources)	N/A
Responsible staff (title/department)	Farmers Livelihood Coordinator; Sustainability department; Telcar Cocoa Ltd.

Non-discrimination

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	ND. 1	Risk of Noncompliance	All farms
Recruitment and Employment Practices	ND.2.1	In Compliance	
	ND.2.3	Risk of Noncompliance	All farms
Compensation Discrimination	ND. 3	In Compliance	
Discrimination in Training and Communication	ND. 4	Noncompliance	All farms
Marital or Pregnancy-Related Discrimination	ND.5.1	In Compliance	
	ND.5.2	In Compliance	
	ND.5.3	In Compliance	
	ND.6.1	In Compliance	
	ND.6.1.1	Risk of Noncompliance	All farms
Health-Related Discrimination	ND. 7	In Compliance	
	ND.8	Not Applicable	
	ND. 9	Not Applicable	
Respect of Culture and Religion	ND.11	In Compliance	

Non-Discrimination Assessment Summary

General Compliance	
Benchmarks	Compliance Status
ND.1: Employers shall comply with all national laws, regulations and procedures concerning non-discrimination.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	Local laws are not exclusively covered in the training topics Source: Farmers interviews
Company Action Plan	

Activity	The Legal department of Telcar had initiated trainings on discrimination in 2021. Facilitators and coaches implement this training towards farmers and LBAs annually. We will continue to: <ol style="list-style-type: none"> 1. Train farmers field school facilitators on national laws, regulation, and procedures on nondiscrimination. 2. Organize farmers field school training/sensitization sessions on national laws, regulations and procedures related to non-discrimination.
Output indicators (targeted results)	Field school session reports to contain topics related to national laws, regulations and procedures on non-discrimination.
Timeline and Deadline Date	4 Months/Deadline February 2024
Input (budget/resources)	<ol style="list-style-type: none"> 1. Training session payment for farmers field school facilitators. 2. Field school facilitators training report tools.
Responsible staff (title/department)	<ol style="list-style-type: none"> 1. Legal Adviser. 2. Farmers Livelihood Coordinator; Telcar's Sustainability department to be responsible for farmers field school operations.

Recruitment and Employment Practices	
Benchmarks:	Compliance Status
ND.2.3: If not provided by law, employers must provide protection to workers who allege any type of discrimination in recruitment and employment practices.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	<p>Even if the assessors have not been reported any cases of retaliation, there is no measures at farm level to protecting workers who allege any type of discrimination in recruitment and employment practices.</p> <p><u>Source:</u> Farmers interviews</p>
Company Action Plan	
Activity	In addition to annual farm inspection to ensure compliance to the rainforest alliance standard, every village dedicated to Nestlé's supply chain has a trained grievance committee. Part of their job is to train farmers and farm workers on the grievance procedure. The presence of these committees assures workers in an event of discrimination in recruitment and employment practices. We will continue enlightenment on Telcar's grievance procedure.
Output indicators (targeted results)	Farmers, farm workers and Telcar employees have access to grievance procedure either through farm archived documents or notice boards.
Timeline and Deadline Date	4 Months/ Deadline February 2024.
Input (budget/resources)	Grievance committee

Responsible staff (title/department)	Grievance Committee members, IMS supervisors .
------------------------------------------------	------------------------------------------------

Discrimination in Training and Communication	
Benchmarks	Compliance Status
ND.4: Employers shall guarantee that all workers have equal access to training and capacity building and no discrimination takes place based on the characteristics noted above, nor on literacy or location of the workers. Training and communication should be given in the native language accessible to workers.	Noncompliance in all farms
Findings/Noncompliance Explanation	During the farm assessment, the assessors noticed that only farmers are involved in the training sessions. <u>Source:</u> Farmers interviews
Company Action Plan	
Activity	Establish a credible communication system that ensures that information reaches farmers and farm workers on time.
Output indicators (targeted results)	Written Communication strategy
Timeline and Deadline Date	4 Months/Deadline February 2024
Input (budget/resources)	Training attendance sheet.
Responsible staff (title/department)	Farmers Livelihood Coordinator; Sustainability department; Telcar cocoa ltd

Marital or Pregnancy-Related Discrimination	
Benchmarks	Compliance Status
ND.6.1.1: Where such legal protective provisions are lacking, employers shall take reasonable measures to ensure the safety and health of pregnant women and their unborn children.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	The assessors did not find any measures for the protection of pregnant or new mothers at farm level <u>Source:</u> Farmers interviews and observation
Company Action Plan	
Activity	Continuous sensitization in farmers field schools, on the national provision benefiting pregnant women.
Output indicators (targeted results)	All farmers, farm workers, Telcar employees should have access to service notes on the protection of pregnant workers/women.
Timeline and Deadline Date	4 Months/Deadline February 2024

Input (budget/resources)	Farmers training/sensitization manual.
Responsible staff (title/department)	Farmers Livelihood Coordinator; Sustainability department; Telcar cocoa Ltd.

Harassment or Abuse

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	H/A.1.1	In Compliance	
	H/A.1.2	In Compliance	
Discipline	H/A.2	Noncompliance	farm 1, farm 20, farm 51, farm 109, farm 121, farm 131, farm 135
	H/A.3	In Compliance	
	H/A.4	In Compliance	
	H/A.5	In Compliance	
	H/A.6	In Compliance	
	H/A.7	In Compliance	
Violence	H/A.13	Risk of Noncompliance	All farms
	H/A.8.1	In Compliance	
	H/A.8.2	In Compliance	
Sexual Harassment	H/A.8.3	In Compliance	
	H/A.9.1	In Compliance	
	H/A.9.2	In Compliance	
	H/A.9.3	In Compliance	
	H/A.9.4	In Compliance	
Security Practices	H/A.9.5 (PR)	Not initiated	All farms
	H/A.10	Not Applicable	
	H/A.10.1	Not Applicable	
	H/A.10.2	Not Applicable	

Harassment or Abuse Assessment Summary

Discipline	
Benchmarks	Compliance Status
H/A.2: Employers shall not use monetary fines and penalties as a means to maintain labor discipline, including for poor performance or for violating employer rules, regulations, and policies. H/A.13: Employers shall only apply corrective measures and discipline which are well explained to workers and are with the intention of continuous improvement	Noncompliance in 7 farms
H/A.13: Employers shall only apply corrective measures and discipline which are well explained to workers and are with the intention of continuous improvement	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	H/A.2: The listed farmers reported retaining part of their workers income for theft, poorly done work and damages caused while working such as cutting of young trees.

	<p>H/A.13: No formal disciplinary process, neither verbal nor written was in place at farm level during the assessment.</p> <p><u>Source:</u> Farmers interviews</p>
Company Action Plan	
Activity	<p>The project on forced labor with ICI starts this crop year 2023/2024. This would help sensitize farmers, farm workers and their communities while reducing the likelihood for such problems. In addition, we will:</p> <ol style="list-style-type: none"> 1. Conduct training on workplace discipline and sanction procedure. 2. Establish a formal disciplinary process at farm level in accordance with national laws.
Output indicators (targeted results)	Service notes discouraging out lawed discipline and sanctions at work to be at the level of farmers, farm workers, Cooperatives/Suppliers and Telcar buying stations.
Timeline and Deadline Date	6 Months/April 2024
Input (budget/resources)	<ol style="list-style-type: none"> 1. Training session payment for farmers field school facilitators. 2. Field school facilitators training report tools.
Responsible staff (title/department)	<ol style="list-style-type: none"> 1. Legal Adviser, Telcar cocoa ltd. 2. Farmers Livelihood Coordinator; Telcar's Sustainability department to be responsible for farmers field school operations.

Forced Labor

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	F.1	In Compliance	
	F.2	In Compliance	
	F.3	In Compliance	
	F.4.1	Not Applicable	
	F.4.2	In Compliance	
	F.5.3	In Compliance	
	F.7.1	In Compliance	
	F.7.2	In Compliance	
	F.7.3	Risk of Noncompliance	farm 1, farm 20, farm 51, farm 109, farm 121, farm 131, farm 135
	F.7.4	In Compliance	
	F.7.5	In Compliance	
	F.7.6	Risk of Noncompliance	farm 1, farm 20, farm 51, farm 109, farm 121, farm 131, farm 135

	F.7.7	In Compliance	
	F.8	Not Applicable	
Work of Family Members	F.6.1	In Compliance	
	F.6.2	In Compliance	
	F.6.3	In Compliance	
	F.6.4	In Compliance	
Personal Workers Identification and Other Documents	F.9	In Compliance	

Forced Labor Assessment Summary

Freedom in Employment and Movement	
Benchmarks	Compliance Status
<p>F.7: Employers shall not utilize practices that restrict workers freedom of movement or ability to terminate his or her employment. Examples of such practices include, but are not limited to: F.7.3: imposing financial penalties; F.7.6: partially or fully retaining salaries, benefits or any other rights acquired by workers or stipulated by law;</p>	Risk of Noncompliance in 7 farms
Findings/Noncompliance Explanation	<p>7 listed farms reported retaining part of their worker's income for theft, work poorly done and damages caused on young cocoa trees.</p> <p><u>Source:</u> Farmers interviews</p>
Company Action Plan	
Activity	<ol style="list-style-type: none"> 1. Conduct Forced labor sensitization program to farmers in collaboration with International cocoa initiative (ICI). 2. Conduct Field school training on workplace discipline and sanction procedure. 3. Establish a formal disciplinary process at farm level in accordance with national laws.
Output indicators (targeted results)	<p>Service notes discouraging forced labor and out lawed sanctions at work to be at the level of farmers, farm workers, Cooperatives/Suppliers and Telcar buying stations.</p>
Timeline and Deadline Date	<p>6 Months/April 2024</p>
Input (budget/resources)	<ol style="list-style-type: none"> 1. Training session payment for farmers field school facilitators. 2. Forced labor sensitization stipend for coaches. 3. Field school facilitators training report tools. 4. Forced labor sensitization pictograms.
Responsible staff (title/department)	<ol style="list-style-type: none"> 1. Legal Adviser, Telcar's legal department to conduct training on workplace discipline/sanction procedure and to establish a formal disciplinary process at farm level. 2. Project Manager: International Cocoa Initiative will be responsible for conducting Forced labor sensitizations.

	3. Farmers Livelihood Coordinator; Telcar's Sustainability department to be responsible for farmers field school operations.
--	------------------------------------------------------------------------------------------------------------------------------

Child Labor

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	CL.1	Risk of Noncompliance	farm 3, farm 7, farm 10, farm 21, farm 27, farm30, farm 31, farm 33, farm 35, farm 41, farm 54, farm 60, farm 62, farm 66, farm 67, farm 69, farm 79, farm 81, farm 84, farm 86, farm 87, farm 94, farm 102, farm 105, farm 117, farm 118, farm 122, farm 140, farm 147, farm 153, farm 154, farm 155, farm 156
Minimum Age	CL.2	Risk of Noncompliance	farm 1, farm 3; farm 7, farm 10, farm 11, farm 13, farm 14, farm 15, farm 16, farm 17, farm 19, farm 20, farm 21; farm 22, farm 27, farm 29, farm 30, farm 31, farm 32, farm 33, farm 34, farm 35, farm 36, farm 37, farm 38, farm 39, farm 40, farm 41, farm 42, farm 43, farm 44, farm 45, farm 51, farm 52, farm 53, farm 54, farm 55, farm 56, farm 60, farm 61, farm 62, farm 66, farm 67, farm 69, farm 71, farm 72, farm 73, farm 75, farm 78, farm 79, farm 81, farm 82, farm 83, farm 84, farm 85, farm 86, farm 87, farm 88, farm 90, farm 91, farm 93, farm 94, farm 95, farm 96, farm 99, farm 100, farm 101, farm 102, farm 103, farm 104, farm 105, farm 106, farm 107, farm 108, farm 110, farm 111, farm 112, farm 114, farm 115, farm 117, farm 118; farm 120, farm 121, farm 122, farm 131; farm 133, farm 140; farm 141, farm 142, farm 143, farm 146, farm 147; farm 150, farm 153; farm 154; arm 155, farm 156;
Immediate Family Members	CL.3	Risk of Noncompliance	farm 9, farm 21, farm 27, farm 31, farm 33, farm 40, farm 41, farm 50, farm 54, farm 55, farm 60, farm 62, farm 66, farm 69, farm 72, farm 79, farm 81, farm 84, farm 86, farm 87, farm 94, farm 102, farm 105, farm 117, farm 118, farm 138, farm 143
Right to Education	CL.4.1 (PR)	In Compliance	
Young Workers	CL.5	Risk of Noncompliance	farm 35, farm 36, farm 37, farm 43, farm 62, farm 72, farm 73, farm 84
	CL.6.1	Risk of Noncompliance	farm 1, farm 156
	CL.6.2	Risk of Noncompliance	farm 1, farm 156
	CL.7	Risk of Noncompliance	farm 9, farm 21, farm 27, farm 31, farm 33, farm 40, farm 41, farm 50, farm 54, farm 55, farm 60, farm 62, farm 66, farm 69, farm 72, farm 79, farm 81, farm 84, farm 86, farm 87, farm 94, farm 102, farm 105, farm 117, farm 118, farm 138, farm 143
Apprenticeships and Vocational Training	CL.8.1 (PR)	Not Applicable	
	CL.8.2 (PR)	Not Applicable	
Children on Premises	CL.9	Risk of Noncompliance	farm 1, farm 4, farm 5, farm 7, farm 8, farm 10, farm 11, farm 12, farm 13, farm 14, farm 15, farm 16, farm 17, farm 18, farm 19, farm 21, farm 22, farm 27, farm 28, farm 29, farm 31,

			farm 32, farm 33, farm 34, farm 35, farm 36, farm 37, farm 38, farm 39, farm 40, farm 42, farm 44, farm 45, farm 50, farm 52, farm 54, farm 55, farm 56, farm 57, farm 58, farm 60, farm 61, farm 62, farm 63, farm 64, farm 66, farm 67, farm 68, farm 69, farm 70, farm 72, farm 73, farm 74, farm 75, farm 76, farm 77, farm 78, farm 79, farm 80, farm 81, farm 82, farm 83, farm 84, farm 85, farm 86, farm 87, farm 88, farm 89, farm 90, farm 91, farm 93, farm 94, farm 95, farm 96, farm 99, farm 100, farm 101, farm 102, farm 103, farm 104, farm 105, farm 106, farm 107, farm 108, farm 109, farm 110, farm 111, farm 112, farm 114, farm 115, farm 116, farm 117, farm 118, farm 120, farm 122, farm 125, farm 130, farm 134, farm 135, farm 136, farm 137, farm 140, farm 141, farm 143, farm 145, farm 148, farm 153, farm 154, farm 156
Removal and Rehabilitation of Child Laborers	CL.10.1	In Compliance	
	CL.10.2 (PR)	In Compliance	

Child Labor Assessment Summary

General Compliance	
Benchmarks	Compliance Status
CL.1: Employers shall comply with all national laws, ratified international conventions, fundamental labor rights, regulations and procedures concerning the prohibition of child labor.	Risk of Noncompliance in 34 farms
Findings/Noncompliance Explanation	<p>According to Affiliate country IMS, the Company desired labor standards are contained in TELCAR Code and in the commodity supply agreement contracts that parties sign for, and retain a copy. These two documents are presented in a language that is understood by parties (e.g. French or English as the language competency of the party may be). Illustrations of common labour practices that contravene the Company Code are also presented in pictograms e.g. No use of Child Labor, use of PPE etc. which are posted at strategic locations that farmers and workers have access. Annual internal inspections aid in determining any gaps related to access. But 30 interviewed farmers said that they are not aware of child labor requirement. 22 of them were not aware that they should not employ children under 15 years.</p> <p><u>Source:</u> Farmers interviews</p>
Company Action Plan	
Activity	The ICI-CLMRS Project with Telcar is currently at the Remediation phase (Education, Sensitization, Community development & Empowerment) within the Nestlé dedicated supply chain. 6100 farmers and 5404 children were monitored in 177 communities. This accounts for 100% in targeted farmers household outreach within Nestlé dedicated supply chain. This work is continues .
Output indicators (targeted results)	1. Sensitization report against child labor.

Timeline and Deadline Date	8 Months/Deadline June 2024
Input (budget/resources)	1. Sensitization stipend for child labor coaches.
Responsible staff (title/department)	1. Project Manager; International Cocoa Initiative.

Minimum Age	
Benchmarks	Compliance Status
CL.2: Employers shall comply with ILO Convention 138 and shall not employ anyone under the age of 15 or under the age for completion of compulsory education, whichever is higher. If a country has a specified minimum age of 14 years due to insufficiently developed economy and educational facilities, employers might follow national legislations but must work to progressively raise the minimum age to 15 years.	Risk of Noncompliance in 97 farms
Findings/Noncompliance Explanation	<p>The company conducts training and awareness activities for its suppliers. The topics include child labor. Its policies on labour standards and its Code are also posted on notice boards in different growing and storage locations besides copies being given to lead farmers and cooperative groups' leadership. No working child was met during the assessment, but 87 of the listed farmers reported not being aware of the company CoC, hence they are not aware of ILO requirement about child labor. 30 reported that they have never heard about child labor including 22 who said that they do not know that they should not employ children aged 15 and under. Three other (Farm 53, Farm 54 and Farm 131) reported that they needed children to help work in the farms taking time off from school or not attending school. Globally, interviewed farmers' workers profiling revealed that 75 children below 15 years worked as seasonal workers in the sampled population (boys- 51, girls- 24) and 80 children below 15 years worked as family workers (boys- 37, girls- 43).</p> <p><u>Source:</u> Farmers interviews</p>
Company Action Plan	
Activity	<p>389 out of 1736 (22%) children identified to be child labourers within the Nestlé dedicated supply chain are currently out of child labor activities. Cargill, Telcar and ICI aims to improve this fit through continuous remediation (Education, Sensitization, Community development & Empowerment). We will continue to:</p> <ol style="list-style-type: none"> 1. Sensitize farmers on Telcar's code of conduct through farmers field schools. 2. Sensitize on the adverse effect of child labor.
Output indicators (targeted results)	<ol style="list-style-type: none"> 1. Farmers field school training sessions report on Telcar's code of conduct. 2. Sensitization report against child labor.

Timeline and Deadline Date	8 Months/Deadline June 2024
Input (budget/resources)	<ol style="list-style-type: none"> 1. Sensitization stipend for child labor coaches. 2. FFS session stipend for facilitators
Responsible staff (title/department)	<ol style="list-style-type: none"> 1. Project Manager; International Cocoa Initiative. 2. Farmers Livelihood Coordinator; Telcar's Sustainability department to be responsible for farmers field school operations.

Immediate Family Members	
Benchmarks	Compliance Status
<p>CL.3: In accordance with national laws and ILO Convention 138, children of producers not younger than 12 years may be involved in light work on their parents' farm provided that:</p> <ul style="list-style-type: none"> • The work is not dangerous and not harmful to their health or development; • The work does not prejudice their attendance at school and is done within reasonable time limits after school or during holidays; • The work is appropriate to the child's age and physical condition and does not jeopardize the child's social, moral or physical development; • The child's parents provide supervision and guidance. 	Risk of Noncompliance in 27 farms
Findings/Noncompliance Explanation	
Company Action Plan	
Activity	During Proximity outreach and Community awareness of the CLMRS project, farmers are presented with pictograms that indicates hazardous work prohibited for children. We will continue Proximity outreach to sensitize against child labor
Output indicators (targeted results)	Sensitization reports against child labor.
Timeline and Deadline Date	8 Months/Deadline June 2024
Input (budget/resources)	Sensitization stipend for child labor coaches.
Responsible staff (title/department)	Project Manager; International Cocoa Initiative.

Young Workers	
Benchmarks	Compliance Status
CL.5: Employers shall abide by all relevant rules and procedures where the law requires government permits or permission from parents as a condition of employment of young workers.	Risk of Noncompliance in 8 farms

<p>CL.6.1: Employers shall comply with all relevant laws that apply to young workers, (e.g., those between the minimum legal working age and the age of 18) including regulations related to hiring, working conditions, types of work, hours of work, proof of age documentation, and overtime. CL.6.2: Employers shall maintain a list of all young workers, their entry dates, proof of age and description of their assignment.</p>		<p>Risk of Noncompliance in 2 farms</p>
<p>CL.7: No person under the age of 18 shall undertake hazardous work, i.e., work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of persons under the age of 18. Such work includes, but is not limited to, the application of agricultural chemicals, pesticides, and fertilizers, use of farm equipment tools and machinery, lifting or moving of heavy materials or goods, or carrying out hazardous tasks such as underground or underwater or at dangerous heights. Every activity performed by a young worker must be supervised by an adult.</p>		<p>Risk of Noncompliance in 27 farms</p>
<p>Findings/Noncompliance Explanation</p>	<p>The minimum age for work/employment provided by the Labor Code is 14 years. 8 listed farms workers profile indicated children younger than 14 years working as part of family labor and as seasonal workers on the farms. The assessment team did not observe any child working at the time of the assessment. Current regulations do not provide for government permits and parental consent. Interviewed farmers do not keep any documentation of young workers. Whereas no child was observed doing hazardous work, 27 listed farmers were unaware of the hazardous work prohibited for children under 18 years in agriculture.</p> <p><u>Source:</u> Farmers interviews and observation</p>	
<p>Company Action Plan</p>		
<p>Activity</p>	<ol style="list-style-type: none"> Continued Proximity outreach to sensitize against child labor and hazardous work for children. Establish an archiving system that includes farm workers age document, job description, hours of work. 	
<p>Output indicators (targeted results)</p>	<ol style="list-style-type: none"> Sensitization report against child labor. An archiving system containing farm workers and Telcar employees' age information in place at both farm level Telcar buying stations. 	
<p>Timeline and Deadline Date</p>	<p>8 Months/Deadline June 2024</p>	
<p>Input (budget/resources)</p>	<ol style="list-style-type: none"> Sensitization stipend for child labor coaches. 	
<p>Responsible staff (title/department)</p>	<ol style="list-style-type: none"> Project Manager; International Cocoa Initiative to be in charge of proximity outreach. Audits & Compliance Coordinator, sustainability department of Telcar cocoa ltd. 	

Health, Safety and Environment

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HSE.1.	Risk of Noncompliance	farm 1, farm 3, farm 5, farm 6, farm 7, farm 8, farm 9, farm 10, farm 11, farm 13, farm 15, farm 21, farm 22, farm 23, 27, farm 28, farm 30, farm 31, farm 34, farm 35, farm 36, farm 37, farm 38, farm 40, farm 41, farm 42, farm 43, farm 44, farm 45, farm 47, farm 48, farm 49, farm 52,

			farm 54, farm 55, farm 56, farm 57, farm 58, farm 59, farm 60, farm 61, farm 62, farm 63, farm 66, farm 69, farm 71, farm 72, farm 73, farm 75, farm 78, farm 79, farm 81, farm 83, farm, 85, farm 86, farm 87, farm 88, farm 89, farm 90, farm 91, farm 92, farm 93, farm 94, farm 95, farm 96, farm 98, farm 99, farm 100, farm 102, farm 103, farm 104, farm 105, farm 106, farm 107, farm 108, farm 109, farm 111, farm 112, farm 114, farm 115, farm 117, farm 121, farm 122, farm 131, farm 134, farm 136, farm 138, farm 139, farm 140, farm 141, farm 143, farm 145, farm 146, farm 147, farm 150, farm 151, farm 152, farm 153, farm 154, farm 155, farm 156
Document Maintenance, Permits and Certificates	HSE.2 (PR)	In Compliance	
	HSE.3.1	In Compliance	
	HSE.4 (PR)	Not Applicable	
Evacuation Requirements and Procedure	HSE.5.1 (PR)	Not Applicable	
	HSE.5.2	Not Applicable	
Safety Equipment and First Aid	HSE.6.1 (PR)	Not initiated	All farms
	HSE.6.2 (PR)	Not initiated	All farms
	HSE.16.3 (PR)	Not initiated	All farms
Personal Protective Equipment	HSE.7 (PR)	Not initiated	All farms
	HSE.8	Noncompliance	farm 1, farm 3, farm 5, farm 6, farm 7, farm 8, farm 9, farm 10, farm 11, farm 13, farm 15, farm 21, farm 22, farm 23, 27, farm 28, farm 30, farm 31, farm 34, farm 35, farm 36, farm 37, farm 38, farm 40, farm 41, farm 42, farm 43, farm 44, farm 45, farm 47, farm 48, farm 49, farm 52, farm 54, farm 55, farm 56, farm 57, farm 58, farm 59, farm 60, farm 61, farm 62, farm 63, farm 66, farm 69, farm 71, farm 72, farm 73, farm 75, farm 78, farm 79, farm 81, farm 83, farm, 85, farm 86, farm 87, farm 88, farm 89, farm 90, farm 91, farm 92, farm 93, farm 94, farm 95, farm 96, farm 98, farm 99, farm 100, farm 102, farm 103, farm 104, farm 105, farm 106, farm 107, farm 108, farm 109, farm 111, farm 112, farm 114, farm 115, farm 117, farm 121, farm 122, farm 131, farm 134, farm 136, farm 138, farm 139, farm 140, farm 141, farm 143, farm 145, farm 146, farm 147, farm 150, farm 151, farm 152, farm 153, farm 154, farm 155, farm 156
Chemical Management	HSE.9.1	Risk of Noncompliance	farm 1, farm 4, farm 5, farm 7, farm 8, farm 10, farm 11, farm 12, farm 13, farm 14, farm 15, farm 16, farm 17, farm 18, farm 19, farm 21, farm 22, farm 27, farm 28, farm 29, farm 31, farm 32, farm 33, farm 34, farm 35, farm 36, farm 37, farm 38, farm 39, farm 40, farm 42, farm 44, farm 45, farm 50, farm 52, farm 54, farm 55, farm 56, farm 57, farm 58, farm 60, farm 61, farm 62, farm 63, farm 64, farm 66, farm 67, farm 68, farm 69, farm 70, farm 72, farm 73, farm 74, farm 75, farm 76, farm 77, farm 78, farm 79, farm 80, farm 81, farm 82, farm 83, farm 84, farm 85, farm 86, farm 87, farm 88, farm 89, farm 90, farm 91, farm 93, farm 94, farm 95, farm 96, farm 99, farm 100, farm 101, farm 102, farm 103, farm 104, farm 105, farm 106, farm, 107, farm 108, farm 109, farm 110, farm, 111, farm 112, farm 114, farm 115, farm 116, farm 117, farm 118, farm 120, farm 122, farm 125, farm 130, farm 134, farm 135, farm 136, farm 137, farm 140, farm 141, farm 143,

			farm 145, farm 148, farm 153, farm 154, farm 156
	HSE.9.2	Noncompliance	farm 1, farm 2, farm 3, farm 7, farm 9, farm 10, farm 22, farm 31, farm 40, farm 48, farm 49, farm 59, farm 60, farm 66, farm 80, farm 87, farm 89, farm 90, farm 92, farm 96, farm 98, farm 101, farm 111, farm 113, farm 116, farm 132, farm 133, farm 135, farm 141, farm 142, farm 147, farm 148, farm 150, farm 151, farm 152, farm 155, farm 156
	HSE.9.2.1	In Compliance	
	HSE.10	Noncompliance	All farms
	HSE.11.1	Risk of Noncompliance	All farms
	HSE.11.2	In Compliance	
Protection Reproductive Health	HSE.12.1	Risk of Noncompliance	All farms
	HSE.12.2 (PR)	In Compliance	
Infrastructure	HSE.13 (PR)	Not Applicable	
	HSE.17.1	In Compliance	
	HSE.17.2 (PR)	In Compliance	
	HSE.19 (PR)	In Compliance	
	HSE.21 (PR)	In Compliance	
	HSE.22 (PR)	Not Applicable	
Machinery Safety	HSE.14.1	Noncompliance	farm 1, farm 2, farm 3, farm 7, farm 9, farm 10, farm 22, farm 31, farm 40, farm 48, farm 49, farm 59, farm 60, farm 66, farm 80, farm 87, farm 89, farm 90, farm 92, farm 96, farm 98, farm 101, farm 111, farm 113, farm 116, farm 132, farm 133, farm 135, farm 141, farm 142, farm 147, farm 148, farm 150, farm 151, farm 152, farm 155, farm 156
	HSE.14.2	Risk of Noncompliance	All farms
	HSE.14.3	In Compliance	
	HSE.14.4	In Compliance	
Ergonomics and Medical Facilities	HSE.15.2 (PR)	Not initiated	
	HSE.16.2	Noncompliance	All farms

Health Safety and Environment Assessment Summary

General Compliance	
Benchmarks	Compliance Status
HSE.1: Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.	Risk of Noncompliance in 93 farms
Findings/Noncompliance Explanation	According to the IMS, the Company's communication of its labour standards is an ongoing activity done by field officers/lead farmers but also have scheduled annual events like the annual general meeting. The content of the communication in such meeting include Traceability, Child Labour, Forced Labour, quality of the produce and environmental conservation. Polices on labour standards and the Company Code are also posted on notice boards in different growing and storage locations besides copies being given to lead farmers and cooperative groups' leadership. The Company desired labor standards are contained in TELCAR Code and in the commodity supply agreement contracts that parties sign for, and retain a copy. These two documents are presented in a language that is understood by parties (e.g. French or English as the language competency of the party may be). Illustrations of common labour practices that contravene the

	<p>Company Code are also presented in pictograms e.g. No use of Child Labor, use of PPE etc. which are posted at strategic locations that farmers and workers have access. Annual internal inspections aid in determining any gaps related to access. But following the farmers' interviews, the listed farms reported that they had not been educated in health, safety and environment.</p> <p><u>Source:</u> Farmers interview</p>
Company Action Plan	
Activity	<p>Facilitators and Coaches were trained on topics related to health, safety and environment by the health, safety and environment department of Telcar in 2021. Farmers are trained on the aforementioned topics annually since 2021.</p> <ul style="list-style-type: none"> - Continued sensitization on Health, Safety and Environment.
Output indicators (targeted results)	Health, Safety and Environment service notes at farmers and farm workers reach.
Timeline and Deadline Date	4 Months/Deadline February 2024
Input (budget/resources)	Sensitization stipend for facilitators.
Responsible staff (title/department)	Internal Management System supervisors(IMS); Telcar cocoa ltd.

Personal Protective Equipment	
Benchmarks	Compliance Status
HSE.8: Workers shall be provided with training on the use and maintenance of personal protective equipment.	Noncompliance in 93 farms
Findings/Noncompliance Explanation	<p>About 2/3 of the interviewed farmers reported that they did not receive training on appropriate PPE use</p> <p><u>Source:</u> Farmers interview</p>
Company Action Plan	
Activity	Farmers field school refresher sessions on the use of PPEs.
Output indicators (targeted results)	Farmers field school refresher session reports on the use of PPEs.
Timeline and Deadline Date	4 Months /Deadline February 2024.
Input (budget/resources)	FFS session stipend for facilitators.
Responsible staff (title/department)	Farmers Livelihood Coordinator; Telcar's Sustainability department, Telcar cocoa ltd.

Chemical Management	
Benchmarks	Compliance Status
HSE.9.1: Chemicals and hazardous substances in use must be allowed by local law or by international standards.	Risk of Noncompliance in 101 farms
HSE.9.2: All chemicals and hazardous substances shall be properly labelled and stored in secure and ventilated areas and disposed of in a safe and legal manner, in accordance with applicable laws. Where relevant, Material Safety Data Sheets (MSDS) must be available as well.	Noncompliance in 33 farms
HSE.10: Workers shall receive training, appropriate to their job responsibilities, concerning the hazards, risks and the safe use of chemicals and other hazardous substances.	Noncompliance in all farms
HSE.11.1: To prevent unsafe exposure to hazardous chemicals and hazardous substances, appropriate accommodations shall be made for pregnant women and workers under the age of 18, as required by applicable laws or the provisions of the FLA Workplace Code, in a manner that does not unreasonably disadvantage workers.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	<p>HSE.9.1: According to the IMS, they conduct training on Good Agriculture Practices-Use of approved chemicals and training on safe use and disposal of agro-chemicals. During the farm visits, no banned agrochemicals were noted during the assessment. But the listed farms were unaware of expressly authorized/recommended or banned agrochemicals.</p> <p>HSE.9.2: Some farmers reported storing their agrochemicals in their houses.</p> <p>HSE.10: Training currently covers only farmers. So no workers benefited from any training about the hazard, risks and the safe use of chemicals and other hazardous substances.</p> <p>HSE.11.1: Even if the assessors did not meet any pregnant woman exposed to hazardous chemicals and substances, they could note that there are no chemical management procedures specific to pregnant women and young workers at farm level.</p> <p><u>Source:</u> Farmers and IMS interview</p>
Company Action Plan	
Activity	<p><u>Farmers receive the updated list of homologated agrochemicals every year during farmers field school training sessions. We will continue to:</u></p> <ol style="list-style-type: none"> 1. Sensitize farmers and farm workers on the list of homologated and banned agrochemicals. 2. Sensitize farmers and farm workers on agrochemical application and procedure.
Output indicators (targeted results)	<ol style="list-style-type: none"> 1. Presence of homologated and banned agrochemical lists at the level of the farmer and farm workers. 2. Service notes prohibiting application of agrochemicals by pregnant women and young workers.
Timeline and Deadline Date	4 Months/Deadline February 2024
Input (budget/resources)	Sensitization stipend for facilitators.
Responsible staff (title/department)	Sustainability department, Telcar cocoa Ltd.

Protection Reproductive Health	
Benchmarks	Compliance Status
HSE.12.1: Employers shall ensure that women are not engaged in work that constitutes a substantial risk to their reproductive health.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	Even if the assessors did not meet case of women engaged in work that constitutes a substantial risk to their reproductive health, they noticed that there is no procedure in place to prevent such a situation <u>Source:</u> Farmers interview and observation
Company Action Plan	
Activity	There is a service note that prevents women from performing hazardous work. Farmers are sensitized on this note during farmers field school sessions. We will continue to sensitize farmers, farm workers and Telcar employees on the type of hazardous work related risk to women.
Output indicators (targeted results)	Farmers, farm workers and Telcar employees have access to service notes on women performing hazardous work.
Timeline and Deadline Date	6 Months/Deadline April 2024
Input (budget/resources)	Sensitization stipend
Responsible staff (title/department)	Health, Safety and Environment Manager, Telcar cocoa ltd.

Machinery Safety	
Benchmarks	Compliance Status
HSE.14.1: All production machinery, equipment and tools shall be properly guarded and regularly maintained.	Noncompliance in 33 farms
HSE.14.2: Where appropriate, workers shall receive training in the proper use and safe operation of machinery, tractors, equipment and tools they use.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	HSE.14.1: During the field visits, some farmers reported storing their agrochemicals spraying machines in their houses. HSE.14.2: The workers are not invited to trainings, they are guided on farm operations and tool usage by the producers <u>Source:</u> Farmers interview and observation
Company Action Plan	
Activity	<ol style="list-style-type: none"> Continued sensitization on agrochemical handling and storage procedure. Establish a credible communication system that ensures that information (training announcement) reaches farmers and farm workers on time.

Output indicators (targeted results)	<ol style="list-style-type: none"> 1. Farmers, farm workers, farmers' family should have access to agrochemical handling and storage procedure. 2. FFS training sessions attendance sheet to include farmers, farm workers, and family members.
Timeline and Deadline Date	4 Months/Deadline February 2024.
Input (budget/resources)	Sensitization Stipend
Responsible staff (title/department)	IMS SUPERVISORS ; Sustainability department, Telcar cocoa ltd.

Infrastructure - Childcare Facilities	
Benchmarks	Compliance Status
CL.9: The employer shall ensure that children (including those residing on the farm and those of migrant workers) are not exposed to dangerous agriculture production activities, including exposure to chemicals/pesticides.	Risk of Noncompliance in 101 farms
Findings/Noncompliance Explanation	<p>No children observed engaging in dangerous activities at the farms during assessment, however farmers unawareness of health and safety measures and the list of banned chemicals poses risk to their health and that of the children.</p> <p><u>Source:</u> Farmers interview and observation</p>
Company Action Plan	
Activity	<ol style="list-style-type: none"> 1. Sensitize farmers and farm workers on the list of homologated and banned agrochemicals. 2. Sensitize farmers and farm workers on dangerous work for children.
Output indicators (targeted results)	<ol style="list-style-type: none"> 1. Presence of homologated and banned agrochemical lists at the level of the farmer and farm workers. 2. Service notes prohibiting application of agrochemicals by young workers (Below 18 years old).
Timeline and Deadline Date	4 Months/Deadline February 2024
Input (budget/resources)	Sensitization stipend for facilitators.
Responsible staff (title/department)	IMS SUPERVISORS ; Sustainability department, Telcar cocoa ltd.

Ergonomics and Medical Facilities	
Benchmarks	Compliance Status
HSE.16.2: Medical facilities shall be established and maintained as required by applicable laws. In case of no local law, the employer shall ensure that the workers are able to utilize local service providers in case of medical emergencies and have the local medical officer's contact address available to the workers. In the case of a medical emergency, e.g., injury or sudden illness, growers will not unreasonably delay allowing a worker to have access to medical treatment.	Risk of Noncompliance in all farms

Findings/Noncompliance Explanation	No medical facility is provided to the worker in case of medical emergencies <u>Source:</u> Farmers interview
Company Action Plan	
Activity	Sensitization on first aid and emergency response procedure at farm level.
Output indicators (targeted results)	<ol style="list-style-type: none"> 1. Farmers, farm workers to access a first aid box and a trained first aid officer at the level of their respective villages. 2. Access to an emergency response plan for farmers and farm workers at the level of respective villages.
Timeline and Deadline Date	6 Months/April 2024
Input (budget/resources)	<ol style="list-style-type: none"> 1. Farmers, farm workers sensitization stipend. 2. Training budget for first aid officers. 3. First aid boxes and drugs.
Responsible staff (title/department)	Health, Safety and Environment Manager, Telcar cocoa ltd.

Hours of Work

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HOW.1.1	Risk of Noncompliance	All farms
	HOW.1.2	In Compliance	
	HOW.1.3	In Compliance	
	HOW.1.4	Not Applicable	
Rest Day	HOW.2	In Compliance	
Meal and Rest Breaks	HOW.3	In Compliance	
Protected Workers	HOW.4.1	Risk of Noncompliance	All farms
	HOW.4.2 (PR)	Not initiated	
	HOW.4.3	Risk of Noncompliance	All farms
Overtime	HOW.5.1	In Compliance	
	HOW.5.2 (PR)	Not Applicable	
	HOW.6.1	In Compliance	
	HOW.6.2	Not Applicable	
	HOW.6.3 (PR)	Not Applicable	
	HOW.7	In Compliance	
Public Holidays and Leave	HOW.8.1	In Compliance	
	HOW.8.2	In Compliance	
	HOW.8.3	Not Applicable	
	HOW.9	In Compliance	
	HOW.10.1	In Compliance	
	HOW.11 (PR)	In Compliance	
	HOW.12.1 (PR)	Not Applicable	
	HOW.12.2 (PR)	In Compliance	
HOW.13	In Compliance		

	HOW.14	In Compliance	
	HOW.15 (PR)	In Compliance	
	HOW.16 (PR)	In Compliance	

Hours of Work Assessment Summary

General Compliance	
Benchmarks	Compliance Status
HOW.1.1: Employers shall comply with all national laws, regulations and procedures concerning hours of work, public holidays and leave.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	None of the farmers were aware of requirements on hours of work. <u>Source:</u> Farmers interview
Company Action Plan	
Activity	Sensitize farmers and farm workers on national laws, regulations and procedures regarding hours of work, public holidays and leave.
Output indicators (targeted results)	<ol style="list-style-type: none"> 1. Farmers and farm workers access to service notes on hours of work, public holidays, and leave. 2. Sensitization report on hours of work, public holidays, and leaves. 3. Work time record register to be present at farm level.
Timeline and Deadline Date	6 Months/Deadline April 2024
Input (budget/resources)	Sensitization stipend
Responsible staff (title/department)	IMS SUPERVISORS; Sustainability department, Telcar cocoa ltd.

Protected Workers (pregnant or nursing women, young workers)	
Benchmarks	Compliance Status
HOW.4.1: The workplace shall comply with all applicable laws governing work hours regulating or limiting the nature, frequency and volume of work performed by pregnant or nursing women or young workers. HOW.4.3: If not provided by law, employers must provide protection to workers who allege violations of laws governing work hours limiting the nature, frequency and volume of work performed by pregnant or nursing women or young workers.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	Assessors did not find any pregnant or nursing women or young workers. But farmers are unaware of the legal requirements on working hours for pregnant or nursing women or young workers. <u>Source:</u> Farmers interview
Company Action Plan	
Activity	Sensitize farmers and farm workers on working hours for pregnant or nursing women and young workers.

Output indicators (targeted results)	<ol style="list-style-type: none"> 1. Farmers and farm workers access to service notes on working hours for pregnant or nursing women and young workers. 2. Sensitization report on hours of work for pregnant or nursing women, young workers. 3. Work time record register to be present at farm level.
Timeline and Deadline Date	6 Months/Deadline April 2024
Input (budget/resources)	Sensitization stipend
Responsible staff (title/department)	IMS SUPERVISORS ; Sustainability department, Telcar cocoa ltd.

Compensation

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	C.1.1	In Compliance	All farms
	C.1.2	Noncompliance	farm 1, farm 20, farm 51, farm 109, farm 121, farm 131, farm 135
	C.1.3	In Compliance	All farms
	C.1.4 (PR)	In Compliance	
Minimum Wage/Fair Compensation	C.2.1	In Compliance	
	C.2.2	Not Applicable	
	C.2.3	In Compliance	
	C.2.4 (PR)	Not initiated	All farms
	C.2.5 (PR)	Not initiated	All farms
	C.2.6 (PR)	Not initiated	All farms
Farmer/Producer Income	C.3	Not Applicable	
	C.4 (PR)	In progress	All farms
Wage Payment and Calculation	C.6	In Compliance	
	C.7.1	In Compliance	
	C.7.2	In Compliance	
	C.7.3 (PR)	In Compliance	
	C.7.4 (PR)	In Compliance	
	C.7.5	In Compliance	
	C.8.1	Not Applicable	
	C.8.2	Not Applicable	
	C.8.3	Not Applicable	
	C.8.4 (PR)	In Compliance	
	C.9 (PR)	Not Applicable	
	C.10.1	In Compliance	
	C.10.1.1	In Compliance	
	C.10.2	In Compliance	
C.10.3	In Compliance		
Workers Awareness	C.11.1.1	In Compliance	
	C.11.1.2	Not Applicable	
	C.11.1.3	Not Applicable	
	C.11.1.4	Not Applicable	
	C.11.1.5	In Compliance	
	C.13 (PR)	In progress	All farms
Fringe Benefits	C.12.1	In Compliance	
	C.12.2 (PR)	In Compliance	

	C.12.3	In Compliance
	C.12.4	In Compliance
	C.12.5	In Compliance

Compensation Assessment Summary

General Compliance	
Benchmarks	Compliance Status
C.1.2: Other than lawfully required deductions, no other deductions may be made from a worker's compensation without the written consent of the worker. Financial disciplinary measures are prohibited.	Noncompliance in 4 farms
Findings/Noncompliance Explanation	C.1.2: The listed farmers reported retaining part of their worker's income either for theft, poorly done work and damages caused on young trees <u>Source:</u> Farmers interview
Company Action Plan	
Activity	<ol style="list-style-type: none"> 1. Sensitize farmers and farm workers on national law provisions as regards payment and compensation. 2. Conduct training on workplace discipline and sanction procedure.
Output indicators (targeted results)	<ol style="list-style-type: none"> 1. Sensitization report as regards payment and compensation of workers per national law. 2. Field school session report on workplace discipline and sanction procedure.
Timeline and Deadline Date	6 Months/April 2024
Input (budget/resources)	<ol style="list-style-type: none"> 1. Training session payment for farmers field school facilitators. 2. Field school facilitators training report tools.
Responsible staff (title/department)	<ol style="list-style-type: none"> 1. Legal Adviser, Telcar's legal department will be responsible for Country labor laws. 2. Farmers Livelihood Coordinator; Telcar's Sustainability department to be responsible for farmers field school operations.

Overview - Farms vs. Non-compliances

Total number of Farms: 156

	Employment Relationship	Non-discrimination	Harassment or Abuse	Forced Labor	Child Labor	Freedom of Association and Collective Bargaining	Health, Safety and Environment	Hours of Work	Compensation	Total
% of farms with one or more non-compliances or risk of non-compliances	100%	100%	100%	4%	81%	0%	100%	100%	100%	
Total number of benchmarks (excl. progressive benchmarks)	48	14	19	19	9	25	16	19	27	196
Farm No. 1	20	5	2	2	4	0	10	3	4	50
Farm No. 2	18	5	2	0	0	0	7	3	3	38
Farm No. 3	17	5	2	0	2	0	9	3	3	41
Farm No. 4	18	5	2	0	1	0	6	3	3	38
Farm No. 5	17	5	2	0	1	0	8	3	3	39
Farm No. 6	17	5	2	0	0	0	7	3	3	37
Farm No. 7	19	5	2	0	3	0	10	3	3	45
Farm No. 8	17	5	2	0	1	0	8	3	3	39
Farm No. 9	17	5	2	0	2	0	9	3	3	41
Farm No. 10	19	5	2	0	3	0	10	3	3	45
Farm No. 11	19	5	2	0	2	0	8	3	3	42
Farm No. 12	17	5	2	0	1	0	6	3	3	37
Farm No. 13	19	5	2	0	2	0	8	3	3	42
Farm No. 14	19	5	2	0	2	0	6	3	3	40
Farm No. 15	19	5	2	0	2	0	8	3	3	42
Farm No. 16	19	5	2	0	2	0	6	3	3	40
Farm No. 17	19	5	2	0	2	0	6	3	3	40
Farm No. 18	17	5	2	0	1	0	6	3	3	37
Farm No. 19	19	5	2	0	2	0	6	3	3	40
Farm No. 20	19	5	2	2	1	0	5	3	4	41
Farm No. 21	17	5	2	0	5	0	8	3	3	43
Farm No. 22	19	5	2	0	2	0	10	3	3	44
Farm No. 23	17	5	2	0	0	0	7	3	3	37
Farm No. 24	17	5	2	0	0	0	5	3	3	35
Farm No. 25	17	5	2	0	0	0	5	3	3	35
Farm No. 26	18	5	2	0	0	0	5	3	3	36
Farm No. 27	19	5	2	0	5	0	8	3	3	45
Farm No. 28	18	5	2	0	1	0	8	3	3	40
Farm No. 29	19	5	2	0	2	0	6	3	3	40

Farm No.	30	20	5	2	0	2	0	7	3	3	42
Farm No.	31	20	5	2	0	5	0	10	3	3	48
Farm No.	32	19	5	2	0	2	0	6	3	3	40
Farm No.	33	19	5	2	0	5	0	6	3	3	43
Farm No.	34	19	5	2	0	2	0	8	3	3	42
Farm No.	35	19	5	2	0	4	0	8	3	3	44
Farm No.	36	19	5	2	0	3	0	8	3	3	43
Farm No.	37	19	5	2	0	3	0	8	3	3	43
Farm No.	38	19	5	2	0	2	0	8	3	3	42
Farm No.	39	19	5	2	0	2	0	6	3	3	40
Farm No.	40	19	5	2	0	4	0	10	3	3	46
Farm No.	41	19	5	2	0	3	0	7	3	3	42
Farm No.	42	19	5	2	0	2	0	8	3	3	42
Farm No.	43	19	5	2	0	2	0	7	3	3	41
Farm No.	43	19	5	2	0	2	0	8	3	3	42
Farm No.	45	19	5	2	0	2	0	8	3	3	42
Farm No.	46	17	5	2	0	0	0	5	3	3	35
Farm No.	47	17	5	2	0	0	0	7	3	3	37
Farm No.	48	18	5	2	0	0	0	9	3	3	40
Farm No.	49	17	5	2	0	0	0	9	3	3	39
Farm No.	50	17	5	2	0	3	0	6	3	3	39
Farm No.	51	20	5	2	2	1	0	5	3	4	42
Farm No.	52	19	5	2	0	2	0	8	3	3	42
Farm No.	53	17	5	2	0	1	0	5	3	3	36
Farm No.	54	19	5	2	0	5	0	8	3	3	45
Farm No.	55	19	5	2	0	4	0	8	3	3	44
Farm No.	56	19	5	2	0	2	0	8	3	3	42
Farm No.	57	17	5	2	0	1	0	8	3	3	39
Farm No.	58	18	5	2	0	1	0	8	3	3	40
Farm No.	59	17	5	2	0	0	0	9	3	3	39
Farm No.	60	19	5	2	0	5	0	10	3	3	47
Farm No.	61	19	5	2	0	2	0	8	3	3	42
Farm No.	62	19	5	2	0	6	0	8	3	3	46
Farm No.	63	17	5	2	0	1	0	8	3	3	39
Farm No.	64	17	5	2	0	1	0	6	3	3	37
Farm No.	65	17	5	2	0	0	0	5	3	3	35
Farm No.	66	19	5	2	0	5	0	10	3	3	47
Farm No.	67	17	5	2	0	3	0	6	3	3	39
Farm No.	68	17	5	2	0	1	0	6	3	3	37
Farm No.	69	19	5	2	0	5	0	8	3	3	45
Farm No.	70	17	5	2	0	1	0	6	3	3	37
Farm No.	71	19	5	2	0	1	0	7	3	3	40
Farm No.	72	19	5	2	0	5	0	8	3	3	45
Farm No.	73	19	5	2	0	3	0	8	3	3	43
Farm No.	74	17	5	2	0	1	0	6	3	3	37
Farm No.	75	19	5	2	0	2	0	8	3	3	42
Farm No.	76	17	5	2	0	1	0	6	3	3	37
Farm No.	77	17	5	2	0	1	0	6	3	3	37
Farm No.	78	19	5	2	0	2	0	8	3	3	42
Farm No.	79	19	5	2	0	5	0	8	3	3	45

Farm No.	80	17	5	2	0	1	0	8	3	3	39
Farm No.	81	19	5	2	0	5	0	8	3	3	45
Farm No.	82	19	5	2	0	2	0	6	3	3	40
Farm No.	83	19	5	2	0	2	0	8	3	3	42
Farm No.	84	19	5	2	0	6	0	6	3	3	44
Farm No.	85	19	5	2	0	2	0	8	3	3	42
Farm No.	86	19	5	2	0	4	0	8	3	3	44
Farm No.	87	19	5	2	0	5	0	10	3	3	47
Farm No.	88	19	5	2	0	2	0	8	3	3	42
Farm No.	89	19	5	2	0	1	0	10	3	3	43
Farm No.	90	19	5	2	0	2	0	10	3	3	44
Farm No.	91	19	5	2	0	2	0	8	3	3	42
Farm No.	92	18	5	2	0	0	0	9	3	3	40
Farm No.	93	20	5	2	0	2	0	8	3	3	43
Farm No.	94	20	5	2	0	5	0	8	3	3	46
Farm No.	95	20	5	2	0	2	0	8	3	3	43
Farm No.	96	20	5	2	0	2	0	10	3	3	45
Farm No.	97	17	5	2	0	0	0	5	3	3	35
Farm No.	98	18	5	2	0	0	0	9	3	3	40
Farm No.	99	19	5	2	0	2	0	8	3	3	42
Farm No.	100	20	5	2	0	2	0	8	3	3	43
Farm No.	101	19	5	2	0	2	0	8	3	3	42
Farm No.	102	19	5	2	0	5	0	8	3	3	45
Farm No.	103	19	5	2	0	2	0	8	3	3	42
Farm No.	104	19	5	2	0	2	0	8	3	3	42
Farm No.	105	19	5	2	0	5	0	8	3	3	45
Farm No.	106	19	5	2	0	2	0	8	3	3	42
Farm No.	107	19	5	2	0	2	0	8	3	3	42
Farm No.	108	19	5	2	0	2	0	8	3	3	42
Farm No.	109	18	5	2	2	1	0	8	3	4	43
Farm No.	110	19	5	2	0	2	0	6	3	3	40
Farm No.	111	19	5	2	0	2	0	10	3	3	44
Farm No.	112	19	5	2	0	2	0	8	3	3	42
Farm No.	113	17	5	2	0	0	0	7	3	3	37
Farm No.	114	19	5	2	0	2	0	8	3	3	42
Farm No.	115	19	5	2	0	2	0	8	3	3	42
Farm No.	116	17	5	2	0	1	0	8	3	3	39
Farm No.	117	20	5	2	0	5	0	8	3	3	46
Farm No.	118	17	5	2	0	5	0	6	3	3	41
Farm No.	119	17	5	2	0	0	0	5	3	3	35
Farm No.	120	20	5	2	0	2	0	6	3	3	41
Farm No.	121	21	5	2	2	1	0	7	3	4	45
Farm No.	122	20	5	2	0	3	0	8	3	4	45
Farm No.	123	17	5	2	0	0	0	5	3	3	35
Farm No.	124	17	5	2	0	0	0	5	3	3	35
Farm No.	125	17	5	2	0	1	0	6	3	3	37
Farm No.	126	17	5	2	0	0	0	5	3	3	35
Farm No.	127	17	5	2	0	0	0	5	3	3	35
Farm No.	128	17	5	2	0	0	0	5	3	3	35
Farm No.	129	17	5	2	0	0	0	5	3	3	35

Farm No. 130	17	5	2	0	1	0	6	3	3	37
Farm No. 131	19	5	2	2	1	0	7	3	4	43
Farm No. 132	17	5	2	0	0	0	7	3	3	37
Farm No. 133	19	5	2	0	1	0	7	3	3	40
Farm No. 134	17	5	2	0	1	0	7	3	3	38
Farm No. 135	17	5	2	2	1	0	8	3	4	42
Farm No. 136	18	5	2	0	1	0	8	3	3	40
Farm No. 137	17	5	2	0	1	0	6	3	3	37
Farm No. 138	18	5	2	0	2	0	7	3	3	40
Farm No. 139	17	5	2	0	0	0	7	3	3	37
Farm No. 140	17	5	2	0	3	0	8	3	3	41
Farm No. 141	20	5	2	0	2	0	10	3	3	45
Farm No. 142	19	5	2	0	1	0	7	3	3	40
Farm No. 143	19	5	2	0	4	0	8	3	3	44
Farm No. 144	17	5	2	0	0	0	5	3	3	35
Farm No. 145	19	5	2	0	1	0	8	3	3	41
Farm No. 146	20	5	2	0	1	0	7	3	3	41
Farm No. 147	17	5	2	0	2	0	9	3	3	41
Farm No. 148	17	5	2	0	1	0	8	3	3	39
Farm No. 149	17	5	2	0	0	0	5	3	3	35
Farm No. 150	20	5	2	0	1	0	9	3	3	43
Farm No. 151	17	5	2	0	0	0	9	3	3	39
Farm No. 152	18	5	2	0	0	0	9	3	3	40
Farm No. 153	17	5	2	0	3	0	8	3	3	41
Farm No. 154	17	5	2	0	3	0	8	3	3	41
Farm No. 155	20	5	2	0	2	0	9	3	3	44
Farm No. 156	19	5	2	0	4	0	10	3	3	46
TOTAL	2862	780	312	14	302	0	1164	468	476	6378
Average % of compliance per code element	61.78	64.29	89.47	99.53	78.49	100.00	53.37	84.21	88.70	79.14